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May 16, 2006

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Notice of Ex Parte Presentation – CC Docket No. 01-92*

Dear Ms. Dortch:

This letter is to advise you that on behalf of Verizon Wireless, I met today with Scott K. Bergmann, Legal Advisor to Commissioner Jonathan Adelstein, to discuss the “phantom” traffic issue.

In the meeting, we discussed the various phantom traffic proposals before the Commission. Verizon Wireless believes that the best way for carriers to resolve disputes related to “phantom” traffic is for terminating carriers to determine the source of originating traffic based on billing records, and then to initiate discussions and enter contracts with originating carriers. This is especially the case when the originating carrier is a wireless carrier because the jurisdiction of traffic exchanged between local exchange carriers and wireless carriers is typically based on negotiated traffic factors.

Verizon Wireless opposes Commission rules requiring carriers to populate the Jurisdiction Information Parameter (“JIP”) in the SS7 network because, despite its name, JIP does not provide reliable jurisdictional information. The JIP identifies the originating switch, which in the wireless context might cover multiple states, LATAs, or MTAs. In the meeting, we discussed the technical limitations built into the industry standard for populating JIP, and why the Commission should view technical feasibility from the perspective of whether the current network can perform the function

rather than whether an engineer with unlimited resources could devise a solution.

We also discussed the Commission's existing Part 64 rules requiring carriers to pass calling party number ("CPN") when they offer services using Signaling System 7.

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Verizon Wireless opposes new enforcement rules for "phantom" traffic because the parties proposing such rules have not demonstrated why such new rules are necessary.

Consistent with the Commission's rules on *ex parte* communications, this letter is being filed electronically in the captioned docket. Please let me know if there are any questions related to this filing.

Very truly yours,

A handwritten signature in black ink, appearing to read "Charon Phillips". The signature is fluid and cursive, with the first name "Charon" and last name "Phillips" clearly distinguishable.

Charon Phillips

cc: S. Bergmann